



State of Utah

Department of  
Environmental Quality

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DIVISION OF AIR QUALITY  
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DAQ-076-05

MEMORANDUM

**TO:** Air Quality Board

**THROUGH:** Richard Sprott, Executive Secretary

**FROM:** John D. Jenks, New Source Review permit engineer

**DATE:** October 20, 2005

**SUBJECT:** Variance Request for Holcim (US) Inc., Devil's Slide Plant

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On September 12, 2005, Holcim (US) Inc. submitted a request for a variance from Condition 12.A of their Approval Order DAQE-AN0007019-05, and from Condition II.B.7.b of their Title V Operating Permit 2900001001. These two conditions impose a maximum clinker production limit of 799,100 short tons per rolling 12-month period. This condition serves as a surrogate for a PM<sub>10</sub> emissions limit. The Utah Division of Air Quality (UDAQ) staff has received a copy of this variance request and has reviewed it along with supporting air quality dispersion modeling.

Staff Recommendation: UDAQ staff recommends that should the Board grant Holcim (US) Inc. the requested variance that the following conditions be imposed as conditions of the variance.

1. Annual production shall be limited to 930,000 tons of clinker per rolling 12-month period. All related monitoring, recordkeeping and reporting requirements shall remain as outlined in Approval Order DAQE-AN0007019-05, and Title V Operating Permit #2900001001.
2. All baghouse stacks shall be physically modified to vent vertically unrestricted no later than Jan 1, 2006.
3. Mining, crushing, material transfer and storage of all raw materials at the plant shall be performed between the hours of 5 am and 8 pm. This condition applies daily.

4. A fugitive dust control plan for all paved and unpaved roads shall be submitted for approval by UDAQ. This plan shall detail the steps necessary to demonstrate compliance with a 0.2 g/m<sup>2</sup> silt loading level. A compliance monitoring protocol shall also be submitted for approval by DAQ.
5. Holcim (US) Inc. shall conduct daily ambient PM<sub>10</sub> monitoring at a site to be approved by DAQ. Monitoring shall begin no later than January 1, 2006. Monitoring shall continue until one year of data has been collected which demonstrates compliance with the NAAQS, or until Holcim (US) Inc. submits an analysis to DAQ demonstrating an operating scenario whose impact is less than 90% of the NAAQS and their permit is granted.
6. Holcim (US) Inc. shall take all steps necessary to insure compliance with the NAAQS, including curtailing or ceasing production should such actions become required. Should an exceedance be monitored, enforcement action may be initiated.
7. This variance is granted for one year starting on November 2, 2005, or until such time as Holcim (US) Inc. is issued an Approval Order modification and a revised Title V Operating Permit which detail a new rolling 12-month production limitation.